COMMITTEE ON ARMED SERVICES

COMMITTEE ON
COMMERCE, SCIENCE, AND TRANSPORTATION

MARK BEGICH
ALASKA

COMMITTEE ON VETERANS' AFFAIRS

COMMITTEE ON THE BUDGET

United States Senate

WASHINGTON, DC 20510

July 8, 2010

The Honorable Lisa P. Jackson
Administrator
Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue NW
Washington, DC 20460

Docket ID No. EPA-HQ-OAR-2007-0294

Dear Administrator Jackson,

Please accept my formal comments on the Environmental Protection Agency's (EPA) Advanced Notice of Proposed Rulemaking (ANPR) on lead emissions from piston-engine aircraft using leaded aviation gasoline (avgas).

I am extremely concerned the EPA may move to regulate emission standards from piston engine aircraft through phasing out or eliminating avgas. This would have a direct and significant negative impact on Alaskans.

The effect of any regulation of avgas by the EPA will be magnified in Alaska. With over 10,000 piston engine aircraft, Alaska is considered by many to be the small plane capital of the world. Our state has six times more pilots and 16 times more planes per capita than the rest of the country. The predominance of piston engine aircraft is a direct result of Alaska's expansive geography and limited road infrastructure. Over 80 percent of Alaska communities have no road access and rely completely on piston-engine aircraft to stay connected to the rest of the state.

Most of Alaska's rural communities are served by shorter gravel airstrips which cannot accommodate larger jet aircraft. Because of these logistical limitations, general aviation and air taxis are a critical component of commerce and are the prevalent method of transporting people, goods, and mail to Alaska's roadless communities. When Alaskans in a remote village require medical treatment at a hospital, most frequently they travel to a larger community via piston engine aircraft. The EPA's regulatory announcement for the proposed rulemaking on avgas states, "lead is not used in jet fuel, the fuel utilized by most commercial aircraft." While this statement may hold true for the Lower 48 states, the vast majority of commercial aircraft in Alaska are smaller piston-driven aircraft, which use avgas.

SUITE 750
510 L STREET
ANCHORAGE, AK 99501
(907) 271-5915

SUITE 206
101 12TH AVENUE
FAIRBANKS, AK 99701
(907) 456-0261

SUITE 308
ONE SEALASKA PLAZA
JUNEAU, AK 99801
(907) 586-7700

SUITE 101
805 FRONTAGE ROAD
KENAI, AK 99611
(907) 283-4000

SUITE 230
1900 FIRST AVENUE
KETCHIKAN, AK 99901
(907) 225-3000

SUITE SR-144
RUSSELL BUILDING
WASHINGTON, DC 20510
(202) 224-3004

In addition to the important role they play in statewide commerce, piston engine aircraft are an integral tool for research and transportation services for various federal agencies' operations in Alaska. The National Oceanic and Atmospheric Administration, Minerals Management Service, U.S. Fish and Wildlife Service, U.S. National Forest Service, and the U.S. National Park Service all utilize piston engine aircraft to carry out their missions.

If the EPA phases out or eliminates low lead avgas, many communities would be forced to use larger turboprop aircraft. Turboprop aircraft have significantly higher operating costs, as well as a larger carbon footprint. Additionally, not all turboprop aircraft can land on the short gravel runways typical of rural Alaska. Any regulation of avgas may have the unintended consequence of increasing greenhouse gas emissions from aircraft. These additional costs would be borne by rural Alaskans who already face some of the highest costs of living in the country.

The ANPR correctly concludes, "converting in-use aircraft/engines to operate on unleaded aviation gasoline would be a significant logistical challenge, and in some cases a technical challenge as well." Currently, there is no substitute fuel for 100 Low Lead (100LL), the most common type of avgas. The EPA should not phase out or eliminate 100LL until a suitable replacement is found. A suitable substitute fuel should be affordable and should not require costly or impractical engine or airframe modifications to the in-use piston engine aircraft fleet.

Transitioning to an unleaded avgas is a desirable goal which the aviation industry in partnership with the FAA and EPA should continue to work towards. In an effort to find a replacement fuel the FAA, in conjunction with the aviation and petrochemical industries, must direct additional resources to developing an unleaded alternative to 100LL. As a Senator, I will support the FAA and industry's efforts to perform the necessary research and certification of an unleaded substitute fuel.

Any new regulatory standard requiring transition to an unleaded aviation gasoline poses significant challenges to the aviation community and has safety implications for my constituents. I implore you to carefully consider the comments submitted by Alaskans who will be most directly affected by the EPA's decision.

I appreciate the EPA's extension of the comment period on this rulemaking to August 27, 2010. In an effort to ensure impacted parties have ample opportunity to submit comments, I respectfully request you extend the comment period for this rulemaking for an additional two months to October 31, 2010. The summer months are the busiest time of year for Alaska's aviators, many of whom operate small businesses. An additional 60

days would allow more time for Alaskans to fully review and comment on the proposed rulemaking.

Finally, as co-chair of the Senate General Aviation Caucus, I invite the EPA to work with our Caucus to more thoroughly address the challenges posed by this proposed rulemaking.

The premature regulation of leaded avgas will have a substantially negative impact on transportation, health, and safety in Alaska. At this point, the potential costs to Alaska associated with regulating avgas far outweigh the benefits and threaten to leave Alaska's rural communities without a reliable means of transportation. Thank you for the opportunity to provide comments on this important issue and for your attention to this request. Please do not hesitate to contact me if you wish to discuss this further.

Sincerely,

Mark Begich
United States Senator

cc: The Honorable J. Randolph Babbitt, FAA Administrator
The Honorable Senator Mike Johanns, Senate GA Caucus Co-Chair